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**VIA ECF**

Honorable Pamela K. Chen, United States District Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. McMahon, et al.***  
**Docket No. 21-cr-265**

Dear Judge Chen:

As Your Honor is aware, this Firm represents defendant Michael McMahon in the above-captioned matter.

Defendant Michael McMahon does not intend, at the present time, to call any witnesses not included on the Government's witness list and accordingly does not here provide a witness list. He does, however, reserve the right to call any witnesses on that list whom the Government determines not to call; he also reserves the right to supplement this submission as circumstances warrant at trial.

Thank you for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence Lustberg  
Lawrence S. Lustberg

cc: All counsel of record (via ECF)